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DEPARTMENT OF THE ARMY
HEADQUARTERS, UNITED STATES ARMY GARRISON
FORT IRWIN, CA 92310-5000

September 17, 2014

Matt Salazar
Mail Stop EN-2-1
Enforcement Division
Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94109

Subject: Petition for Specific operating Limits for Pyrolysis Waste to Energy Unit
Subject to New Source Performance Standards (NSPS) Part 60, Subpart EEEE

Dear Mr. Salazar:

The National Training Center (NTC) at Fort Irwin hereby petitions the EPA to allow the use of a dry scrubber at the proposed waste to energy (WTE) plant to be located at Fort Irwin, California.

The proposed WTE is subject to NSPS 40 CFR 60 Subpart EEEE and under Section 2917, the NTC is required to petition the EPA to allow the use of an alternate control device in the event a wet scrubber is not used to comply with emission limitations under §60.2915. This requirement is also a permit condition in the recent draft Authority to Construct (ATC) from the Mojave Desert Air Quality Management.

This petition does not seek higher allowable emission rates. Instead, NTC seeks to demonstrate compliance with the emission limits under §60.2915.
As required under §60.2917, this Petition includes the following elements:

a. Identify specific operating limits that will be used to set operating limits

b. Discussion of relationship between operating limits and emission limits

c. Discussion of establishing upper and lower limits of operating parameters that will be used to set emission limits

d. Discussion of methods that will be used to measure and monitor the operating parameters as well as the relative accuracy of these methods

e. A review of the methods and frequency for recalibration the equipment that will be used for monitoring

There are several technical and practical reasons why this project would employ a dry scrubber instead of a wet scrubber as required under Subpart EEEE. Specifically, the proposed dry scrubber would achieve the same (or higher level) of emission control as compared to a wet scrubber. In addition, the dry scrubber avoids the problem of having to dispose of contaminated water. A dry scrubber which is part of an all in one system works in conjunction with the thermal oxidizer that is designed for the reduction of NOx. A description of the dry scrubber is attached to this letter.

Since the project is located in the Mojave Desert, the availability of water is extremely limited. The lack of water is further exacerbated due to California's on-going drought. As a result, the use of a wet scrubber is not practical at a desert location.

The attached information details the specific steps that will be undertaken to ensure compliance with Subpart EEEE and specifically with §60.2917. The WTE will be under construction during September 2014 thru April 2015. We anticipate the initial source tests during late April/May 2015.

If you have any questions, the POC for this memorandum is the undersigned at 760-380-3410, [HYPERLINK "mailto:justine.e.dishart.civ@mail.mil"]

Sincerely

JUSTINE E. DISHART
Chief, Environmental Division
Directorate of Public Works

Copies: Mark Burns – Directorate of Public Works, NTC Fort Irwin